

MONROE COUNTY CLERK'S OFFICE

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No. Pages: 21

Instrument: EFILING INDEX NUMBER

Control #: Unrecorded #7800797

Index #: Unassigned-1412205

Date:

Time:

DOE, JOHN

DIOCESE OF ROCHESTER
ST. MARY'S CHURCH
OUR LADY OF THE LAKES

Total Fees Paid: \$0.00

Employee:

State of New York

MONROE COUNTY CLERK'S OFFICE
WARNING – THIS SHEET CONSTITUTES THE CLERKS
ENDORSEMENT, REQUIRED BY SECTION 317-a(5) &
SECTION 319 OF THE REAL PROPERTY LAW OF THE
STATE OF NEW YORK. DO NOT DETACH OR REMOVE.

ADAM J BELLO

MONROE COUNTY CLERK



**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF MONROE**

Index No.: _____/19

-----X
JOHN DOE,

**Plaintiffs designate
MONROE COUNTY
as place of trial.**

Plaintiff,

-against -

**The basis of venue is
Defendant's principal
place of business**

**DIOCESE OF ROCHESTER, ST. MARY'S CHURCH,
and OUR LADY OF THE LAKES,**

Defendants.

SUMMONS

**Plaintiff resides in Ontario
County**

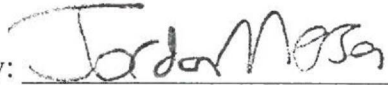
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To the above-named Defendants:

YOU ARE HEREBY SUMMONED to answer the complaint in this action and to serve a copy of your answer or, if the complaint is not served with this summons, to serve a notice of appearance, on the Plaintiff's Attorneys within 20 days after the service of this summons, exclusive of the day of service (or within 30 days after the service is complete if this summons is not personally delivered to you within the State of New York); and in case your failure to appear or answer, judgement will be taken for the relief demanded herein.

**A COPY OF THIS SUMMONS WAS FILED WITH THE CLERK OF THE COURT,
MONROE COUNTY ON _____ IN COMPLIANCE WITH CPLR §§305(a) AND
306(a).**

Dated: New York, New York
August 14, 2019

MERSON LAW, PLLC

By: 
Jordan K. Merson
Attorneys for Plaintiff
150 East 58th Street 34th Floor
New York, New York 10155
(212) 603-9100

TO:
DIOCESE OF ROCHESTER
1150 Buffalo Rd,
Rochester, NY 14624

ST. MARY'S CHURCH
9 Gilbert Street,
Rushville, NY 14544

OUR LADY OF THE LAKES
210 Keuka Street,
Pen Yan, NY 14527

**SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF MONROE**

Index No.: _____/19

-----X
JOHN DOE,**Plaintiff,****-against -****VERIFIED
COMPLAINT****DIOCESE OF ROCHESTER, ST. MARY'S
CHURCH, and OUR LADY OF THE LAKES,****Defendants.**

-----X

Plaintiff,¹ above named, complaining of the Defendants, by **MERSON LAW,****PLLC.,** respectfully allege(s):**NATURE OF THE CLAIM**

1. This is a case of Plaintiff John Doe who was sexually abused as a child by Father Norbert Nolan ("Nolan") at and of St. Mary's Church ("Church") and Diocese of Rochester ("Diocese").
2. Nolan was a priest at St. Mary's Church in Rushville, New York which was part of the Diocese. Nolan was known among the community and the children as a sexual predator.
3. Despite the Diocese's knowledge that Nolan sexually abused children and/or had the propensity to sexually abuse children, the Diocese allowed Nolan unfettered access to children.
4. Beginning in or about 1973 and continuing until approximately 1974, Nolan, while under the scope of employment with the Diocese and while acting on behalf of the Diocese, Nolan would sexually abuse Plaintiff, then approximately eleven years old.

¹ Plaintiff uses a pseudonym because he is a victim of a sex crime pursuant to N.Y. Civ. Rights § 50-b and other statutory and common law principles.

Nolan would force Plaintiff into the changing room on the side of the altar and forced Plaintiff to perform oral sex on him and otherwise sexually abuse him.

5. Plaintiff brings this lawsuit to recover for the emotional and physical suffering he endured because of the negligence of the Roman Catholic Diocese of Rochester and to make sure no other child is forced to suffer the abuse and physical and mental trauma he felt and continues to feel.

PARTIES

6. At all times herein mentioned Defendant **DIOCESE OF ROCHESTER** was a not for profit corporation incorporated in the state of New York and by virtue of the laws of the State of New York.
7. At all times herein mentioned, Defendant **DIOCESE OF ROCHESTER** was located at 1150 Buffalo Road, Rochester, New York 14624.
8. At all times herein mentioned, Nolan was a priest operating under the direction and control of Defendant **DIOCESE OF ROCHESTER**, and its agents, servants and/or employees.
9. At all times herein mentioned, Defendant **DIOCESE OF ROCHESTER** operated and/or controlled St. Mary's Church located at 9 Gilbert Street, Rushville, NY 14544.
10. At all times herein mentioned, Nolan was an agent, servant and/or employee of Defendant **DIOCESE OF ROCHESTER**.
1. At all times herein mentioned Defendant **ST. MARY'S CHURCH** was a not for profit corporation incorporated in the state of New York and by virtue of the laws of the State of New York.

2. At all times herein mentioned, Defendant **ST. MARY'S CHURCH** was located at 1150 Buffalo Road, Rochester, New York 14624.
3. At all times herein mentioned, Nolan was a priest operating under the direction and control of Defendant **ST. MARY'S CHURCH**, and its agents, servants and/or employees.
4. At all times herein mentioned, Defendant **ST. MARY'S CHURCH** operated and/or controlled St. Mary's Church located at 9 Gilbert Street, Rushville, NY 14544.
5. At all times herein mentioned, Nolan was an agent, servant and/or employee of Defendant **ST. MARY'S CHURCH**.
6. At all times herein mentioned Defendant **OUR LADY OF THE LAKES** was a not for profit corporation incorporated in the state of New York and by virtue of the laws of the State of New York.
7. At all times herein mentioned, Defendant **OUR LADY OF THE LAKES** was located at 210 Keuka Street, Pen Yan, NY 14527.
8. At all times herein mentioned, Nolan was a priest operating under the direction and control of Defendant **OUR LADY OF THE LAKES**, and its agents, servants and/or employees.
9. At all times herein mentioned, Defendant **OUR LADY OF THE LAKES** operated and/or controlled St. Mary's Church located at 9 Gilbert Street, Rushville, NY 14544.
10. At all times herein mentioned, Nolan was an agent, servant and/or employee of Defendant **OUR LADY OF THE LAKES**.

11. At all times herein mentioned, Defendants **DIOCESE OF ROCHESTER, ST. MARY'S CHURCH**, and **OUR LADY OF THE LAKES** were agents, servants, employees and/or alter egos of each other.

FACTS OF THE CASE

11. Defendants **DIOCESE OF ROCHESTER, ST. MARY'S CHURCH**, and/or **OUR LADY OF THE LAKE's** negligence and recklessness caused Nolan to have access to the children of its parishes, including on Diocese premises, despite their knowledge that Nolan sexually abused children and/or had the propensity to sexually abuse children and therefore are responsible for the injuries that Plaintiff incurred because but for Defendants **DIOCESE OF ROCHESTER, ST. MARY'S CHURCH**, and **OUR LADY OF THE LAKES's** negligence, Plaintiff would not have suffered the mental and physical anguish inflicted by Nolan. Defendant **DIOCESE OF ROCHESTER's** and Nolan's gross negligence, reckless, wanton, and/or willful conduct supports punitive liability.
12. Nolan sexually abused Plaintiff and many other young patrons of St. Mary's Church in Rushville, New York. Nonetheless, Defendants **DIOCESE OF ROCHESTER, ST. MARY'S CHURCH**, and **OUR LADY OF THE LAKES** failed to remove Nolan from his position as a priest or to take any steps to keep the dangerous predator away from children. In fact, the Diocese continued to allow, encourage and/or permit Nolan to have unfettered access to children.
13. In approximately 1973 and continuing through approximately 1974, Nolan would sexually assault Plaintiff.

14. Nolan sexually abused Plaintiff in the changing room next to the altar at St. Mary's Church and other places.
15. When Plaintiff was approximately 11 years old, Nolan would force Plaintiff into the changing room located next to the altar at St. Mary's Church and force Plaintiff to engage in oral sex.
16. Plaintiff's mother complained to the Bishop about Nolan secluding Plaintiff to no avail and was ignored by the Bishop and/or Diocese.
17. Nolan was able to gain access to Plaintiff by using his position of authority as a priest as provided by the Diocese.
18. As a result of the actions of Nolan, John Doe felt and continues to feel ashamed, embarrassed and humiliated.
19. As such, Plaintiff suffered catastrophic and lifelong injuries as a result of Defendants **DIOCESE OF ROCHESTER, ST. MARY'S CHURCH, and OUR LADY OF THE LAKE's** negligence in undertaking a duty, including but not limited to in locis parentis, in failing to protect the children of its parishes and of its community safe from Nolan despite the Diocese having knowledge that Nolan sexually abused children and/or had the propensity to sexually abuse children, and/or allowing Nolan to continue to have his position of authority and power, and the Diocese failed to adequately supervise Nolan.

AS AND FOR A FIRST CAUSE OF ACTION FOR NEGLIGENCE AS TO THE

DIOCESE OF ROCHESTER

20. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 19., inclusive, with the same force and effect as if hereinafter set forth at length.

21. At all times mentioned herein, Defendant **DIOCESE OF ROCHESTER** owed a duty of care, including but not limited to in locis parentis, to keep the young children, students and patrons of its parishes safe from sexual abuse by its clergymen under its supervision and control, including on company premises that ultimately befell the Plaintiff, and they had a duty to supervise Nolan.
22. At all times mentioned herein, Defendant **DIOCESE OF ROCHESTER** and/or its agents, servants and/or employees breached the above-stated duty in a negligent, reckless, willful and wanton manner, and caused Plaintiff to be sexually assaulted.
23. As a result of the negligence of Defendant **DIOCESE OF ROCHESTER** and/or its agents, servants and/or employees, Plaintiff was caused serious personal injuries, emotional distress, mental pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
24. By reason of the foregoing, Plaintiff is entitled to compensatory damages from Defendants in such sums as a jury would find fair, just and adequate.
25. By reason of the foregoing, Plaintiff is entitled to punitive damages from Defendants in such sums as a jury would find fair, just and adequate.
26. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
27. This action falls within exceptions to Article 16 of the C.P.L.R.

AS AND FOR A SECOND CAUSE OF ACTION FOR NEGLIGENCE

AS TO ST. MARY'S CHURCH

28. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 27., inclusive, with the same force and effect as if hereinafter set forth at length.
29. At all times mentioned herein, Defendant **ST. MARY'S CHURCH** owed a duty of care, including but not limited to in locis parentis, to keep the young children, students and patrons of its parishes safe from sexual abuse by its clergymen under its supervision and control, including on company premises that ultimately befell the Plaintiff, and they had a duty to supervise Nolan.
30. At all times mentioned herein, Defendant **ST. MARY'S CHURCH** and/or its agents, servants and/or employees breached the above-stated duty in a negligent, reckless, willful and wanton manner, and caused Plaintiff to be sexually assaulted.
31. As a result of the negligence of Defendant **ST. MARY'S CHURCH** and/or its agents, servants and/or employees, Plaintiff was caused serious personal injuries, emotional distress, mental pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
32. By reason of the foregoing, Plaintiff is entitled to compensatory damages from Defendants in such sums as a jury would find fair, just and adequate.
33. By reason of the foregoing, Plaintiff is entitled to punitive damages from Defendants in such sums as a jury would find fair, just and adequate.
34. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
35. This action falls within exceptions to Article 16 of the C.P.L.R.

AS AND FOR A THIRD CAUSE OF ACTION FOR NEGLIGENCE AS TO
OUR LADY OF THE LAKES

36. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 35., inclusive, with the same force and effect as if hereinafter set forth at length.
37. At all times mentioned herein, Defendant **OUR LADY OF THE LAKES** owed a duty of care, including but not limited to in locis parentis, to keep the young children, students and patrons of its parishes safe from sexual abuse by its clergymen under its supervision and control, including on company premises that ultimately befell the Plaintiff, and they had a duty to supervise Nolan.
38. At all times mentioned herein, Defendant **OUR LADY OF THE LAKES** and/or its agents, servants and/or employees breached the above-stated duty in a negligent, reckless, willful and wanton manner, and caused Plaintiff to be sexually assaulted.
39. As a result of the negligence of Defendant **OUR LADY OF THE LAKES** and/or its agents, servants and/or employees, Plaintiff was caused serious personal injuries, emotional distress, mental pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
40. By reason of the foregoing, Plaintiff is entitled to compensatory damages from Defendants in such sums as a jury would find fair, just and adequate.
41. By reason of the foregoing, Plaintiff is entitled to punitive damages from Defendants in such sums as a jury would find fair, just and adequate.

42. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.

43. This action falls within exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A FOURTH CAUSE OF ACTION FOR NEGLIGENT HIRING,
RETENTION AND SUPERVISION AS TO THE DIOCESE OF ROCHESTER**

44. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 43., inclusive, with the same force and effect as if hereinafter set forth at length.

45. Defendant **DIOCESE OF ROCHESTER**, had a duty to supervise and prevent known risks of harm to the young children, students and patrons of its parishes by its clergymen.

46. Defendant was negligent in hiring, retaining and supervising their personnel, such as Nolan, who were careless, unskillful, negligent, reckless and acted in a willful and wanton manner in not possessing the requisite knowledge and skill of priests and church officials and other church supervisors who should have properly been supervising the priests and church officials to ensure the safety of the children of its parishes.

47. Defendant **DIOCESE OF ROCHESTER** knew or should have known Nolan sexually abused and/or had the propensity to sexually abuse children and did nothing to stop it.

48. As a result of such negligent hiring, supervising and retention, Plaintiff was caused to suffer serious personal injuries, emotional distress, conscious pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.

49. By reason of the foregoing, Plaintiff is entitled to compensatory damages from Defendants in such sums as a jury would find fair, just and adequate.
50. By reason of the foregoing, Plaintiff is entitled to punitive damages from Defendants in such sums as a jury would find fair, just and adequate.
51. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
52. This action falls within exceptions to Article 16 of the C.P.L.R.

AS AND FOR A FIFTH CAUSE OF ACTION FOR NEGLIGENT HIRING,

RETENTION AND SUPERVISION AS TO ST. MARY'S CHURCH

53. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 52., inclusive, with the same force and effect as if hereinafter set forth at length.
54. Defendant **ST. MARY'S CHURCH**, had a duty to supervise and prevent known risks of harm to the young children, students and patrons of its parishes by its clergymen.
55. Defendant was negligent in hiring, retaining and supervising their personnel, such as Nolan, who were careless, unskillful, negligent, reckless and acted in a willful and wanton manner in not possessing the requisite knowledge and skill of priests and church officials and other church supervisors who should have properly been supervising the priests and church officials to ensure the safety of the children of its parishes.
56. Defendant **ST. MARY'S CHURCH** knew or should have known Nolan sexually abused and/or had the propensity to sexually abuse children and did nothing to stop it.
57. As a result of such negligent hiring, supervising and retention, Plaintiff was caused to suffer serious personal injuries, emotional distress, conscious pain and suffering, mental

anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.

58. By reason of the foregoing, Plaintiff is entitled to compensatory damages from Defendants in such sums as a jury would find fair, just and adequate.
59. By reason of the foregoing, Plaintiff is entitled to punitive damages from Defendants in such sums as a jury would find fair, just and adequate.
60. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
61. This action falls within exceptions to Article 16 of the C.P.L.R.

**AS AND FOR A SIXTH CAUSE OF ACTION FOR NEGLIGENT HIRING,
RETENTION AND SUPERVISION AS TO OUR LADY OF THE LAKES**

62. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 61., inclusive, with the same force and effect as if hereinafter set forth at length.
63. Defendant **OUR LADY OF THE LAKES**, had a duty to supervise and prevent known risks of harm to the young children, students and patrons of its parishes by its clergymen.
64. Defendant was negligent in hiring, retaining and supervising their personnel, such as Nolan, who were careless, unskillful, negligent, reckless and acted in a willful and wanton manner in not possessing the requisite knowledge and skill of priests and church officials and other church supervisors who should have properly been supervising the priests and church officials to ensure the safety of the children of its parishes.

65. Defendant **OUR LADY OF THE LAKES** knew or should have known Nolan sexually abused and/or had the propensity to sexually abuse children and did nothing to stop it.
66. As a result of such negligent hiring, supervising and retention, Plaintiff was caused to suffer serious personal injuries, emotional distress, conscious pain and suffering, mental anguish and/or physical manifestations thereof, and other losses, all of which have not as of yet been ascertained.
67. By reason of the foregoing, Plaintiff is entitled to compensatory damages from Defendants in such sums as a jury would find fair, just and adequate.
68. By reason of the foregoing, Plaintiff is entitled to punitive damages from Defendants in such sums as a jury would find fair, just and adequate.
69. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
70. This action falls within exceptions to Article 16 of the C.P.L.R.

**AS AND FOR THE SEVENTH CAUSE OF ACTION FOR NEGLIGENT
INFLICTION OF EMOTIONAL DISTRESS AS TO THE DIOCESE OF
ROCHESTER**

71. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 70., inclusive, with the same force and effect as if herein set forth at length.
72. Defendant **DIOCESE OF ROCHESTER** and their agents, servants and/or employees, knew or reasonably should have known that the failure to properly advise, supervise and

hire Nolan, the priest who sexually abused Plaintiff, would and did proximately result in physical and emotional distress to Plaintiff.

73. Defendant **DIOCESE OF ROCHESTER** and their agents, servants and/or employees knew or reasonably should have known that the sexual abuse and other improper conduct would and did proximately result in physical and emotional distress to Plaintiff.
74. Defendant has the power, ability, authority and duty to intervene with and/or stop the improper conduct that resulted in Plaintiff being sexually abused by Nolan.
75. Despite said knowledge, power and duty, Defendant negligently failed to act so as to stop, prevent, and prohibit the improper conduct that resulted in Nolan sexually abusing Plaintiff.
76. By reason of the foregoing, Plaintiff is entitled to compensatory damages from Defendants in such sums as a jury would find fair, just and adequate.
77. By reason of the foregoing, Plaintiff is entitled to punitive damages from Defendants in such sums as a jury would find fair, just and adequate.
78. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
79. This action falls within exceptions to Article 16 of the C.P.L.R.

AS AND FOR THE EIGHTH CAUSE OF ACTION FOR NEGLIGENT

INFLECTION OF EMOTIONAL DISTRESS AS TO ST. MARY'S CHURCH

80. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 79., inclusive, with the same force and effect as if herein set forth at length.

81. Defendant **ST. MARY'S CHURCH** and their agents, servants and/or employees, knew or reasonably should have known that the failure to properly advise, supervise and hire Nolan, the priest who sexually abused Plaintiff, would and did proximately result in physical and emotional distress to Plaintiff.
82. Defendant **ST. MARY'S CHURCH** and their agents, servants and/or employees knew or reasonably should have known that the sexual abuse and other improper conduct would and did proximately result in physical and emotional distress to Plaintiff.
83. Defendant has the power, ability, authority and duty to intervene with and/or stop the improper conduct that resulted in Plaintiff being sexually abused by Nolan.
84. Despite said knowledge, power and duty, Defendant negligently failed to act so as to stop, prevent, and prohibit the improper conduct that resulted in Nolan sexually abusing Plaintiff.
85. By reason of the foregoing, Plaintiff is entitled to compensatory damages from Defendants in such sums as a jury would find fair, just and adequate.
86. By reason of the foregoing, Plaintiff is entitled to punitive damages from Defendants in such sums as a jury would find fair, just and adequate.
87. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
88. This action falls within exceptions to Article 16 of the C.P.L.R.

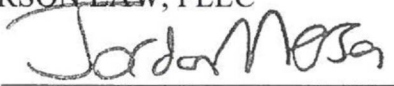
AS AND FOR THE NINTH CAUSE OF ACTION FOR NEGLIGENT
INFLICTION OF EMOTIONAL DISTRESS AS TO OUR LADY OF THE
LAKES

89. Plaintiff repeats, reiterates and realleges each and every allegation contained in those paragraphs of this Complaint marked and designated 1. through 88., inclusive, with the same force and effect as if herein set forth at length.
90. Defendant **OUR LADY OF THE LAKES** and their agents, servants and/or employees, knew or reasonably should have known that the failure to properly advise, supervise and hire Nolan, the priest who sexually abused Plaintiff, would and did proximately result in physical and emotional distress to Plaintiff.
91. Defendant **OUR LADY OF THE LAKES** and their agents, servants and/or employees knew or reasonably should have known that the sexual abuse and other improper conduct would and did proximately result in physical and emotional distress to Plaintiff.
92. Defendant has the power, ability, authority and duty to intervene with and/or stop the improper conduct that resulted in Plaintiff being sexually abused by Nolan.
93. Despite said knowledge, power and duty, Defendant negligently failed to act so as to stop, prevent, and prohibit the improper conduct that resulted in Nolan sexually abusing Plaintiff.
94. By reason of the foregoing, Plaintiff is entitled to compensatory damages from Defendants in such sums as a jury would find fair, just and adequate.
95. By reason of the foregoing, Plaintiff is entitled to punitive damages from Defendants in such sums as a jury would find fair, just and adequate.
96. The amount of damages sought exceeds the jurisdiction of all lower courts which would otherwise have jurisdiction.
97. This action falls within exceptions to Article 16 of the C.P.L.R.

WHEREFORE, Plaintiff demands judgement against Defendant in such sum as a jury would find fair, adequate and just.

Dated: New York, New York
August 14, 2019

MERSON LAW, PLLC

By: 

Jordan K. Merson
Attorney for Plaintiff
150 East 58th Street 34th Floor
New York, New York 10155
(212) 603-9100

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF MONROE

Index No.:

_____/19

-----X
JOHN DOE,

Plaintiff,

-against -

ATTORNEY
VERIFICATIONDIOCESE OF ROCHESTER, ST. MARY'S CHURCH,
and OUR LADY OF THE LAKES,

Defendant.

-----X
JORDAN K. MERSON, an attorney duly admitted to practice in the Courts of New York
State, and a member of the firm MERSON LAW, PLLC., attorneys for the Plaintiff in the
within action, hereby affirms under penalty of perjury:

That he has read the within complaint and knows the contents thereof, and that the
same is true to his own knowledge, except as to the matters therein stated to be alleged upon
information and belief, and that as to those matters he believes it to be true.

That the sources of his information and knowledge are investigations and records in
the file.

That the reason this verification is made by affirmant and not by the Plaintiff is that
the Plaintiff is not within the County where the attorney has his office.

Dated: New York, New York
August 14, 2019


JORDAN K. MERSON

Index No.

Year 2019

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF MONROE

JOHN DOE,

Plaintiff(s),

- against -

DIOCESE OF ROCHESTER, ST. MARY'S CHURCH,
and OUR LADY OF THE LAKES,

Defendant(s),

SUMMONS AND VERIFIED COMPLAINT

Merson Law, PLLC.

Attorneys for Plaintiff(s)

Office and Post Office Address, Telephone
150 East 58th Street 34th Fl.
New York, New York 10155
(212) 603-9100

To: All Parties
